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4 A Limited Liability Partnership
5 Including Professional Corporations
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12 and ON CHAIN INNOVATIONS, LLC

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

11 HIDDEN EMPIRE HOLDINGS, LLC;
12 a Delaware limited liability company;
13 HYPER ENGINE, LLC; a California
limited liability company; DEON
TAYLOR, an individual.

Plaintiffs,
v.

13 DARRICK ANGELONE, an
14 individual; AONE CREATIVE, LLC
15 formerly known as AONE
16 ENTERTAINMENT LLC, a Florida
17 limited liability company; ON CHAIN
18 INNOVATIONS, LLC, a Florida
19 limited liability company.

Defendants.

Case No. 2:22-cv-06515-MWF-AGR
Action Filed: September 12, 2022

**DEFENDANTS' OPPOSITION TO
REQUEST FOR JUDICIAL
NOTICE FILED IN SUPPORT OF
PLAINTIFFS' MOTION FOR
ORDER TO SHOW CAUSE WHY
SANCTIONS SHOULD NOT BE
IMPOSED AGAINST
DEFENDANTS**

DATE: March 18, 2024
TIME: 10:00am
DEPT: 5A

[Filed Concurrently with Memorandum of Points and Authorities in Opposition to Motion; Declaration of Sandra Calin; and Declaration of Darrick Angelone]

23 COMES NOW, Defendants DARRICK ANGELONE, AONE CREATIVE,
24 LLC and ON CHAIN INNOVATIONS, LLC, by and through their attorneys of
25 record, and submit their Opposition to the Request for Judicial Notice filed in support
26 Plaintiffs' Motion for Order to Show Cause Re Sanctions.

27 Plaintiffs ask the Court to take judicial notice of six pleadings from a
28 completely unrelated case, filed by Tosh Berman, in which one of the defendants is

1 Darrick Angelone, one of the defendants in the case at bar. One of the other
 2 defendants in that case is “Greg Comeau, a/k/a, Jacky Jasper doing business as Diary
 3 of a Hollywood Street King.” Although Plaintiffs’ Motion contains some unfounded
 4 allegations regarding “Jacky Jasper” and Plaintiffs contention that Mr. Angelone used
 5 that name, the pleadings in the Request for Judicial Notice clearly differentiate
 6 between Mr. Angelone on the one hand, and another individual who is known by the
 7 name “Jacky Jasper.”

8 In order for the Court to take judicial notice of any documents, the information
 9 contained therein must be relevant to the case. *Threshold Enterprises Ltd. v. Pressed*
 10 *Juicery, Inc.* 445 F. Supp.3d 139 (N.D. Cal. April 7, 2020). See also, *Blye v.*
 11 *California Supreme Court*, 2014 WL 295022 (N.D. Cal. January 21, 2014).

12 The documents that Plaintiffs ask the Court to judicially notice are irrelevant to
 13 this action, and not reasonably calculated to lead to any admissible evidence.
 14 Therefore, Defendants request the Court to deny the Request for Judicial Notice.

15
 16 DATED: February 26, 2024

KRAMER, DEBOER & KEANE

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 18 By:
 19

20 JEFFREY S. KRAMER
 21 SANDRA CALIN
 22 Attorneys for Defendants
 23 DARRICK ANGELONE, AONE
 24 CREATIVE, LLC, and ON CHAIN
 25 INNOVATIONS, LLC

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CERTIFICATE OF SERVICE

I am employed in Los Angeles County, California. I am over the age of 18 and not a party to this action; my business address is 21860 Burbank Blvd., Suite 370, Woodland Hills, CA 91367. My email address is ynelson@kdeklaw.com.

I certify that on February 26, 2024, I served: **DEFENDANTS' OPPOSITION TO REQUEST FOR JUDICIAL NOTICE FILED IN SUPPORT OF PLAINTIFFS' MOTION FOR ORDER TO SHOW CAUSE WHY SANCTIONS SHOULD NOT BE IMPOSED AGAINST DEFENDANTS** on the following parties or counsel of record as follows:

<p>LAWRENCE HINKLE (SBN 180551) STEPHANIE JONES NOJIMA (SBN 178453) JOSHUA ROY ENGEL SANDERS ROBERTS LLP 1055 West 7th Street, Suite 3200 Los Angeles, CA 90017 Telephone: (213) 426-5000 - Facsimile: (213) 234-4581 E-Mail: lhinkle@sandersroberts.com; sjonesnojima@sandersroberts.com; jengel@sandersroberts.com;</p>	<p><i>Counsel for Plaintiffs</i></p>
<p>Justin Kian, Esq. J.T. Fox, Esq. LAW OFFICES OF JT FOX, APC 556 S. Fair Oaks Avenue, Suite 444 Pasadena, California 91105 Telephone: (888) 750-5530 - Fax: (888) 750-5530 Email: jt@jtfoxlaw.com; justin@jtfoxlaw.com</p>	<p><i>Co-Counsel for Defendants</i></p>

By ECF/CM: I electronically filed an accurate copy using the Court's Electronic Court Filing ("ECF") System and service was completed by electronic means by transmittal of a Notice of Electronic Filing on the registered participants of the ECF System.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct. Executed at Santa Clarita, California on February 26, 2024.

/s/ Yolanda Nelson
Yolanda Nelson